

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

BRETT HECKMANN
Plaintiff,

v.

C.A. No. 1:19-cv-00472-JJM-PAS

BRENDAN MCDONALD,
JASON DIGRADO,
GARY MCDOLE AND
CHRISTOPHER KELLY,
Individually and in their official
Capacities as police officers of the
Town of Smithfield, Rhode Island
Defendants.

DEFENDANTS' CONSENTED-TO MOTION TO
EXTEND ALL OF THE PRE-TRIAL DATES

Now come the Defendants, and with the consent of the Plaintiff, move for an extension of all pre-trial dates for an additional thirty (30) days. Currently, discovery closes on December 31, 2020. Defendants and Plaintiff request that factual discovery be extended to February 1, 2021, and that all other pre-trial dates be extended in conformity with the discovery closure date extension. Defendants and Plaintiff state as reason that, although extensive discovery responses and materials have already been exchanged, and the depositions of the Plaintiff, Defendant Jason DiGrado and Defendant Brendan McDonald have already taken place, the depositions of Defendant Gary McDole and Defendant Christopher Kelly remain outstanding, along with the depositions of three (3) witnesses, which require subpoenas. The parties are in the process of scheduling these depositions, which have become somewhat more complicated due to Covid exposures and remote scheduling requirements. As such, the additional time is necessary.

WHEREFORE, Defendants and Plaintiff respectfully request that the pre-trial dates be extended an additional thirty (30) days. Specifically, it is requested that factual discovery be

extended to **February 1, 2021**; Plaintiff's expert disclosures due by **March 3, 2021**; Defendants' expert disclosures due by **April 1, 2021**; Expert Discovery to close on **May 3, 2021**; and Dispositive Motions due by **June 2, 2021**.

Defendants,
By their attorneys,

/s/ Karen K. Corcoran
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/s/ Marc DeSisto
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CERTIFICATION OF SERVICE

I hereby certify that the within document has been electronically filed with the Court on December 17, 2020, that it is available for viewing and downloading from the ECF system, and that the counsel of record listed below will receive notice via the ECF system:

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/s/ Karen K. Corcoran